

EXHIBIT E

KAZEROUNI LAW GROUP, APC
6069 South Fort Apache Road, Suite 100
Las Vegas, Nevada 89148

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1 VERNON A. NELSON, JR., ESQ.
Nevada Bar No.: 6434
2 THE LAW OFFICE OF VERNON NELSON
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3 Las Vegas, NV 89123
Tel.: 702-476-2500
4 Fax.: 702-476-2788
E-mail: vnelson@nelsonlawfirmnv.com
5 *Attorneys for Allied Collection Services, Inc.*

6 UNITED STATES DISTRICT COURT

7 DISTRICT OF NEVADA

8 KARLA GONZALEZ and JAIME RETIGUIN
9 BARBA, SR.,

Case No.: 2:16-cv-02909-MMD-VCF

10 Plaintiffs,

11 v.

12 ALLIED COLLECTION SERVICES, INC.,

13 Defendant.

**DEFENDANT'S RESPONSES TO
PLAINTIFFS' REQUESTS FOR
PRODUCTION OF DOCUMENTS,
SET TWO**

14
15 COMES NOW, Defendant, ALLIED COLLECTION SERVICES, INC., by and through its
16 attorneys THE LAW OFFICE OF VERNON NELSON, and hereby responds to Plaintiffs' Request for
17 Production of Documents, (Set Two) as follows:

18 **GENERAL OBJECTIONS**

19 Defendant asserts and incorporates by reference the following general objections to Plaintiffs'
20 request for production of documents as though they were set forth in full in each response:

21 1. Defendant objects to Plaintiffs' request for production of documents to the extent that
22 the requests are overly broad and unduly burdensome, and to the extent that Plaintiffs seek documents
23 protected from disclosure by the attorney-client privilege, attorney work product doctrine, or other
24 applicable privilege. Inadvertent disclosure of privileged information is not intended to be, and may
25 not be construed as, a waiver of any applicable privilege.

26 2. Defendant objects to Plaintiffs' request for production of documents to the extent that
27 Plaintiffs seek the discovery of information which is beyond the scope of this lawsuit, and therefore
28 irrelevant, immaterial, and not reasonably calculated to lead to the discovery of admissible evidence.

1 3. This response is made without waiver of, and with express reservation of, all objections
2 as to competency, relevancy, materiality, and admissibility of the responses to document requests as
3 evidence for any purpose in any further proceedings in this action (including the trial of this action) or
4 in any other action.

5 4. Likewise, Defendant's objections to Plaintiffs' request for production of documents are
6 based upon the information presently known by the Defendant, and are made without prejudice to the
7 Defendant's right to assert additional objections in the event that additional grounds for objections
8 should be discovered by the Defendant subsequent to this response. Without waiving the above
9 objections, Defendant will provide responses to relevant, non-privileged matters based on information
10 currently available to it, subject only to the requirements for supplementation of responses contained
11 in Fed. R. Civ. P. 26(e).

12 5. Defendant objects to the requests to the extent they attempt to impose obligations that
13 are inconsistent with, or beyond the scope of, those imposed by or authorized under the Federal Rules
14 of Civil Procedure or other applicable law or court rule.

15 6. Defendant objects to the requests to the extent they seek documents or information in
16 the possession, custody, or control of entities or persons other than Defendant.

17 7. Defendant objects to the requests to the extent they seek documents or information that
18 no longer exists or has otherwise been lost, misplaced, or destroyed.

19 8. Defendant objects to the requests as unduly burdensome to the extent that they seek
20 documents previously produced to the Plaintiffs and their attorneys and/or are publicly-available
21 documents including, but not limited to, newspaper clippings, court papers, and documents available
22 on the Internet. Such duplicative and/or publicly-available documents will not be produced.
23 Responding to such requests would be oppressive, unduly burdensome, and unnecessarily expensive,
24 and the burden of responding to such requests is substantially the same or perhaps less for the
25 Plaintiffs than for the Defendant.

26 9. Defendant objects to the requests as unduly burdensome to the extent that they seek
27 documents that are readily or equally available to the Plaintiffs as it is to the Defendant. If a moving
28 party can obtain documents or information without resort to discovery, no cause exists for requesting

1 the discovery. Responding to such requests would be oppressive, unduly burdensome, and
2 unnecessarily expensive, and the burden of responding to such requests is substantially the same or
3 perhaps less for the Plaintiffs as for the Defendant.

4 Subject to and without waiving the foregoing objections, Defendant provide the following
5 responses:

6 **REQUESTS FOR PRODUCTION OF DOCUMENTS**

7 **REQUEST NO. 1:**

8 Plaintiffs' consumer reports you accessed in the last two years.

9 **RESPONSE TO REQUEST NO. 1:**

10 Allied objects to this interrogatory on the basis that it is vague and compound.
11 Specifically, the interrogatory is vague because it fails to provide a definition of the word "access"
12 or "accessed" as the term can be considered a "term of art" when referencing credit reports, credit
13 reports or credit profiles of individuals. Further, the interrogatory is compound because it requests
14 that Allied answer as to all defendants in a single response.

15 Without waiving the foregoing objections, Allied responds as follows: After making a
16 diligent search and reasonable and good faith inquiry to comply with the demand, this responding
17 party lacks the ability to comply with the demand. The inability to comply is because the
18 particular item never existed, or has never been, or is no longer in the possession, custody, or
19 control of the responding party.

20 **REQUEST NO. 2:**

21 The original documents you received from your client in connection with the Mendoza
22 account, i.e., the documents Mendoza sent you when you first began collecting on the Mendoza
23 account at issue in this case.

24 **RESPONSE TO REQUEST NO. 2:**

25 After making a diligent search and reasonable and good faith inquiry to comply with the
26 demand, this responding party lacks the ability to comply with the demand. The inability to comply is
27 because the particular item has never been, or is no longer in the possession, custody, or control of the
28 responding party. Specifically, Allied has never had possession custody or control of any *original*
documents in connection with the "Mendoza account." Further, Allied cannot provide a time frame

1 in which any documents in connection with the "Mendoza account" were provided specific to "when
2 you first began collecting on the Mendoza account..."

3 In an effort to comply with Plaintiffs' request, please see copies of documents that were
4 provided to Allied by its client to support the debt assigned for collections by Charles Mendoza, MD,
5 attached hereto as Exhibit X which Allied asserts are responsive to this request. Discovery and
6 investigation are continuing. Allied reserves the right to supplement this response.

7 **REQUEST NO. 3:**

8 The original documents you received from your client in connection with the Fisher
9 account, i.e., the documents Fisher sent you when you first began collecting on the Fisher account
10 at issue in this case.

11 **RESPONSE TO REQUEST NO. 3:**

12 After making a diligent search and reasonable and good faith inquiry to comply with
13 the demand, this responding party lacks the ability to comply with the demand. The inability to
14 comply is because the particular item has never been, or is no longer in the possession, custody, or
15 control of the responding party. Specifically, Allied has never had possession custody or control of
16 any *original* documents in connection with the "Fisher account." Further, Allied cannot provide a
17 time frame in which any documents in connection with the "Fisher account" were provided specific to
18 "when you first began collecting on the Fisher account..."

19 In an effort to comply with Plaintiffs' request, please see copies of documents that were
20 provided to Allied by its client to support the debt assigned for collections by Christopher Fisher, MD,
21 attached hereto as Exhibit X which Allied asserts are responsive to this request. Discovery and
22 investigation are continuing. Allied reserves the right to supplement this response.

23 **REQUEST NO. 4:**

24 The original documents you received from your client in connection with the Macintyre
25 account, i.e., the documents Macintyre sent you when you first began collecting on the Macintyre
26 account at issue in this case.

27 ///

28 ///

1 **RESPONSE TO REQUEST NO. 4:**

2 After making a diligent search and reasonable and good faith inquiry to comply with the
3 demand, this responding party lacks the ability to comply with the demand. The inability to comply is
4 because the particular item has never been, or is no longer in the possession, custody, or control of the
5 responding party. Specifically, Allied has never had possession custody or control of any *original*
6 documents in connection with the "McIntyre account." Further, Allied cannot provide a time frame
7 in which any documents in connection with the "McIntyre account" were provided specific to "when
8 you first began collecting on the McIntyre account..."

9 In an effort to comply with Plaintiffs' request, please see copies of documents that were
10 provided to Allied by its client to support the debt assigned for collections by Allen McIntyre, MD,
11 attached hereto as Exhibit X which Allied asserts are responsive to this request. Discovery and
12 investigation are continuing. Allied reserves the right to supplement this response.

13 **REQUEST NO. 5:**

14 Any contract that you have with Macintyre, relating to collecting on Macintyre's behalf.

15 **RESPONSE TO REQUEST NO. 5:**

16 Allied objects to this request on the basis that it seeks information that is immaterial, irrelevant
17 and not reasonably calculated to lead to the discovery of admissible evidence. Allied further objects
18 to this request on the basis that it seeks disclosure of information that may be confidential or
19 proprietary in nature.

20 **REQUEST NO. 6:**

21 Any contract that you have with Fisher, relating to collecting on Fisher's behalf.

22 **RESPONSE TO REQUEST NO. 6:**

23 Allied objects to this request on the basis that it seeks information that is immaterial, irrelevant
24 and not reasonably calculated to lead to the discovery of admissible evidence. Allied further objects
25 to this request on the basis that it seeks disclosure of information that may be confidential or
26 proprietary in nature.

27 **REQUEST NO. 7:**

28 Any contract that you have with Mendoza, relating to collecting on Mendoza's behalf.

1 **RESPONSE TO REQUEST NO. 7:**

2 Allied objects to this request on the basis that it seeks information that is immaterial, irrelevant
3 and not reasonably calculated to lead to the discovery of admissible evidence. Allied further objects
4 to this request on the basis that it seeks disclosure of information that may be confidential or
5 proprietary in nature.

6 **REQUEST NO. 8:**

7 A running balance of the Macintyre account from when you started collecting on that
8 account until present.

9 **RESPONSE TO REQUEST NO. 8:**

10 Allied objects to this request on the basis that it is vague and overbroad. Specifically, the
11 request is vague because it fails to set forth if the “running balance” requested should include
12 payments as well as any adjustments and interest accrued on the “Macintyre account.” Further, the
13 interrogatory is vague and overbroad because it fails to set forth if the “running balance” should be
14 provided for the period of time when the account was a debt or after the debt was included as part of
15 the Judgment in the underlying debt collection case, or both.

16 Without waiving the foregoing objections, Allied responds as follows: After making a
17 diligent search and reasonable and good faith inquiry to comply with the demand, this responding
18 party lacks the ability to comply with the demand. The inability to comply is because the
19 particular item never existed, or has never been in the possession, custody, or control of the
20 responding party.

21 **REQUEST NO. 9:**

22 A running balance of the Fisher account from when you started collecting on that account
23 until present.

24 **RESPONSE TO REQUEST NO. 9:**

25 Allied objects to this request on the basis that it is vague and overbroad. Specifically, the
26 request is vague because it fails to set forth if the “running balance” requested should include
27 payments as well as any adjustments and interest accrued on the “Fisher account.” Further, the
28 interrogatory is vague and overbroad because it fails to set forth if the “running balance” should be

1 provided for the period of time when the account was a debt or after the debt was included as part of
2 the Judgment in the underlying debt collection case, or both.

3 Without waiving the foregoing objections, Allied responds as follows: After making a
4 diligent search and reasonable and good faith inquiry to comply with the demand, this responding
5 party lacks the ability to comply with the demand. The inability to comply is because the
6 particular item never existed, or has never been in the possession, custody, or control of the
7 responding party.

8 **REQUEST NO. 10:**

9 A running balance of the Mendoza account from when you started collecting on that
10 account until present.

11 **RESPONSE TO REQUEST NO. 10:**

12 Allied objects to this request on the basis that it is vague and overbroad. Specifically, the
13 request is vague because it fails to set forth if the "running balance" requested should include
14 payments as well as any adjustments and interest accrued on the "Mendoza account." Further, the
15 interrogatory is vague and overbroad because it fails to set forth if the "running balance" should be
16 provided for the period of time when the account was a debt or after the debt was included as part of
17 the Judgment in the underlying debt collection case, or both.

18 Without waiving the foregoing objections, Allied responds as follows: After making a
19 diligent search and reasonable and good faith inquiry to comply with the demand, this responding
20 party lacks the ability to comply with the demand. The inability to comply is because the
21 particular item never existed, or has never been in the possession, custody, or control of the
22 responding party.

23 DATED this 26th day of April, 2018

24 THE LAW OFFICE OF VERNON NELSON

25 By: /s/ Vernon Nelson
26 VERNON A. NELSON, JR., ESQ.
27 Nevada Bar No.: 6434
28 9480 S. Eastern Avenue, Suite 252
Las Vegas, NV 89123
Tel: 702-476-2500
E-Mail: vnelson@nelsonlawfirmnv.com
Attorneys for Allied Collection Services, Inc.

CERTIFICATE OF SERVICE

I, Danielle Alvarado, hereby certify that on the 26th day of April, 2018, I served copies of the following document(s):

DEFENDANT'S RESPONSES TO PLAINTIFFS' REQUESTS FOR PRODUCTION OF DOCUMENTS

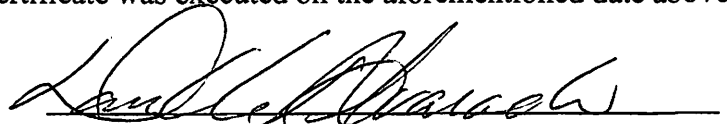
by first class US mail to the person(s) named below at the address(es) stated below for such person(s):

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Attorneys for Plaintiffs

I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is a true and correct statement and that this Certificate was executed on the aforementioned date above.


An employee of
THE LAW OFFICE OF VERNON NELSON

DESERT SURGICAL ASSOCIATES

Patient Face Sheet

10/7/2015

2875152

Patient Chart #: RETI [REDACTED]
 Patient Name: JAIME RETIGUIN
 Street 1: [REDACTED]
 Street 2: [REDACTED]
 City: LAS VEGAS, NV 89121
 Phone: (702)358-9243

D.O.B: [REDACTED] Age: 34
 Sex: Male
 SSN: [REDACTED]
 Mar Status: [REDACTED]
 S.O.F: [REDACTED]
 Assigned Provider:

Employer Name:
 Street 1:
 City:
 Phone:

Case Information

Case Desc: SR FISHER
 Last Visit: 2/2013
 Referral: CHRISTOPHER FISHER MD
 Guarantor Name: [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]

Diagnosis 1:
 Diagnosis 2:
 Diagnosis 3:
 Diagnosis 4:

Ins Co #:
 Insurance 1:
 Street 1:
 Street 2:
 City:
 Phone:
 Ins-Start:
 End:

Insured 1 Name:
 Street 1:
 Street 2:
 Phone:
 D.O.B.:
 Policy Number:
 Group Number:

Sex:

Ins Co #:
 Insurance 2:
 Street 1:
 Street 2:
 City:
 Phone:
 Ins-Start:
 End:

Insured 2 Name:
 Street 1:
 Street 2:
 City:
 Phone:
 D.O.B.:
 Policy Number:
 Group Number:

Sex:

Ins Co #:
 Insurance 3:
 Street 1:
 Street 2:
 City:
 Phone:
 Ins-Start:
 End:

Insured 3 Name:
 Street 1:
 Street 2:
 City:
 Phone:
 D.O.B.:
 Policy Number:
 Group Number:

Sex:

DESERT SURGICAL ASSOCIATES

Patient Ledger

Sorted By: Case Number

Entry	Date	POS Description	Case	Procedure	Document	Provider	Amount
RETJA000	JAIME RETIGUIN						
	Last Payment: 0.00		On: 7/13/2015				
151352	6/22/2013	21	15453	99291	1307050000	CF	655.00
151353	6/22/2013	21	15453	32551	1307050000	CF	530.00
151354	6/22/2013	21	15453	12005	1307050000	CF	490.00
151355	6/22/2013	21	15453	12011	1307050000	CF	315.00
151656	7/9/2013	Patient statement was billed	15453	STATEMENT	1307050000	CF	0.00
152959	7/16/2013	Patient statement was billed	15453	STATEMENT	1307050000	CF	0.00
162487	10/7/2013	Patient statement was billed	15453	STATEMENT	1307050000	CF	0.00
162874	10/7/2013	Patient statement was billed	15453	STATEMENT	1307050000	CF	0.00
168692	11/19/2013	PER PT A/R TB	15453	COLL	1311190000	CF	-1990.00
258312	5/14/2015	22	26330	99205	1505290000	MAC	485.00
258313	5/14/2015	22	26330	44970	1505290000	MAC	1710.00
258353	5/15/2015	22	26330	99024	1505290000	MAC	0.00
258630	6/2/2015	Carrier: CAL00 was billed	26330	CLAIM	1505290000	MAC	0.00
262957	6/11/2015	NEED TO SEND CLAIM TO B	26330	EOB	1506230000	MAC	0.00
265214	6/30/2015	NV002 Billed 6/30/2015 B#3	26330	CLAIM	1505290000	MAC	0.00
269995	7/13/2015	#0118313067 NV ANTHEM	26330	BCPAY	1505290000	MAC	-1.23
269996	7/13/2015	Carrier 1 Deductible -\$250.00	26330	DED	1505290000	MAC	0.00
269997	7/13/2015	Adjustment	26330	BCADJ	1505290000	MAC	-233.63
269998	7/13/2015	#0118313067 NV ANTHEM	26330	BCPAY	1505290000	MAC	-731.29
269999	7/13/2015	Adjustment	26330	BCADJ	1505290000	MAC	-807.18
270000	7/13/2015	#0118313067 NV ANTHEM	26330	BCPAY	1505290000	MAC	0.00
270969	7/24/2015	Patient statement was billed	26330	STATEMENT	1505290000	MAC	0.00
276729	8/25/2015	Patient statement was billed	26330	STATEMENT	1505290000	MAC	0.00
285114	10/7/2015	TO COLLECTIONS	26330	COLL	1510070000	MAC	-421.67
Patient Total							<u>\$0.00</u>

DESERT SURGICAL ASSOCIATES

Patient Face Sheet

10/7/2015

2075321

Patient Chart #: RETJ [REDACTED]
 Patient Name: JAIME RETIGUIN
 Street 1: [REDACTED]
 [REDACTED]
 [REDACTED]

D.O.B: [REDACTED] Age: [REDACTED]
 Sex: Male
 SSN: [REDACTED]
 Mar Status: Married
 S.O.F:
 Assigned Provider:

Employer Name:
 Street 1:
 City:
 Phone:

Case Information

Case Desc: SR MACINTYRE(5/14/2015)
 Last Visit: 5/15/2015
 Referral: WADE N. SEARS MD
 Guarantor Name: [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]

Diagnosis 1:
 Diagnosis 2:
 Diagnosis 3:
 Diagnosis 4:

Ins Co #: [REDACTED]
 Insurance 1: NV ANTHEM
 Street 1: [REDACTED]
 Street 2:
 City: DENVER, CO 80217-5747
 Phone: (888)817-3717
 Ins-Start: [REDACTED]
 End:

Insured 1 Name: JAIME RETIGUIN
 Street 1: [REDACTED] AVE
 Street 2:
 Phone: [REDACTED]
 D.O.B.: [REDACTED] Sex: Male
 Policy Number: [REDACTED]
 Group Number: [REDACTED]

Ins Co #:
 Insurance 2:
 Street 1:
 Street 2:
 City:
 Phone:
 Ins-Start:
 End:

Insured 2 Name:
 Street 1:
 Street 2:
 City:
 Phone:
 D.O.B.:
 Policy Number:
 Group Number: Sex:

Ins Co #:
 Insurance 3:
 Street 1:
 Street 2:
 City:
 Phone:
 Ins-Start:
 End:

Insured 3 Name:
 Street 1:
 Street 2:
 City:
 Phone:
 D.O.B.: Sex:
 Policy Number:
 Group Number:

DESERT SURGICAL ASSOCIATES

Patient Ledger

Sorted By: Case Number

Entry	Date	POS Description	Case	Procedure	Document	Provider	Amount
JAIME RETIGUIN							
	Last Payment: 0.00		On: 7/13/2015				
151352	6/22/2013	21	15453	99291	1307050000	CF	655.00
151353	6/22/2013	21	15453	32551	1307050000	CF	530.00
151354	6/22/2013	21	15453	12005	1307050000	CF	490.00
151355	6/22/2013	21	15453	12011	1307050000	CF	315.00
151656	7/9/2013	Patient statement was billed	15453	STATEMENT	1307050000	CF	0.00
152959	7/16/2013	Patient statement was billed	15453	STATEMENT	1307050000	CF	0.00
162487	10/7/2013	Patient statement was billed	15453	STATEMENT	1307050000	CF	0.00
162874	10/7/2013	Patient statement was billed	15453	STATEMENT	1307050000	CF	0.00
168692	11/19/2013	PER PT A/R TB	15453	COLL	1311190000	CF	-1990.00
258312	5/14/2015	22	26330	99205	1505290000	MAC	485.00
258313	5/14/2015	22	26330	44970	1505290000	MAC	1710.00
258353	5/15/2015	22	26330	99024	1505290000	MAC	0.00
258630	6/2/2015	Carrier: CAL00 was billed	26330	CLAIM	1505290000	MAC	0.00
262957	6/11/2015	NEED TO SEND CLAIM TO B	26330	EOB	1506230000	MAC	0.00
265214	6/30/2015	NV002 Billed 6/30/2015 B#3	26330	CLAIM	1505290000	MAC	0.00
269995	7/13/2015	#0118313067 NV ANTHEM	26330	BCPAY	1505290000	MAC	-1.23
269996	7/13/2015	Carrier I Deductible -\$250.00	26330	DED	1505290000	MAC	0.00
269997	7/13/2015	Adjustment	26330	BCADJ	1505290000	MAC	-233.63
269998	7/13/2015	#0118313067 NV ANTHEM	26330	BCPAY	1505290000	MAC	-731.29
269999	7/13/2015	Adjustment	26330	BCADJ	1505290000	MAC	-807.18
270000	7/13/2015	#0118313067 NV ANTHEM	26330	BCPAY	1505290000	MAC	0.00
270969	7/24/2015	Patient statement was billed	26330	STATEMENT	1505290000	MAC	0.00
276729	8/25/2015	Patient statement was billed	26330	STATEMENT	1505290000	MAC	0.00
285114	10/7/2015	TO COLLECTIONS	26330	COLL	1510070000	MAC	-421.67
Patient Total							<u>\$0.00</u>

ANESTHESIOLOGY CONSULTANTS, INC.
PO BOX 50209
HENDERSON, NV 89016-0209

Business Phone (702) 878-0070
Office Hours 8:00 AM TO 4:30 PM

JAIME ZAVALA
[REDACTED]

Credit Card Using For Payment		
<input type="checkbox"/> Visa <input type="checkbox"/> Mastercard		
Card Number	CSC Num	Amount
Signature		Exp. Date
Statement Date	Balance Due	Account #
01/22/2018	0.00	[REDACTED]
Minimum Payment	0.00	Show Amount Paid Here \$

Remit To

ANESTHESIOLOGY CONSULTANTS, INC.
PO BOX 50209
HENDERSON, NV 89016-0209

☐ Please check box if address is incorrect
or insurance information has changed, and
indicate the change(s) on reverse side

STATEMENT

Please detach and return top
portion with your payment

Date	Ref #	Description	Charges and credits	Insurance pending	Guarantor balance
		Patient: ZAVALA, JAIME			
05/14/2015	00840	Anes service separate from the hospital	1,200.00		
08/06/2015		LATE FEE	40.00		
08/10/2015		External Collection	-1,240.00		
06/04/2016		Reverse External Collection	1,240.00		
06/04/2016		Ref # 132432 from ALLIED COLLECTION	-90.00		
06/04/2016		COMMISSION OFFSET ADJ	-60.00		
06/04/2016		External Collection	-1,090.00		
08/08/2016		Reverse External Collection	1,090.00		
08/08/2016		COMMISSION OFFSET ADJ	-171.36		
08/08/2016		DIRECT PYMNT COMM ADJ	171.36		
08/09/2016		Ref # 0003690612 from CALIFORNIA IRONWORKERS FIELD	-685.44		
08/09/2016		REVERSE ALLIED COMM ADJ	171.36		
08/09/2016		REVERSE DIRECT PYMNT COMM	-171.36		
08/09/2016		COMMISSION OFFSET ADJ	-274.18		
08/09/2016		DIRECT PYMNT COMM ADJ	274.18		
08/15/2016		External Collection	-404.56		
08/27/2016		Reverse External Collection	404.56		
08/27/2016		ADDITIONAL CONTRACTUAL WOFF	-574.40		
08/27/2016		REVERSE POSTED CHARGE	-1,200.00		
08/27/2016		REINSTATE ADJUSTMENT	574.40		
08/27/2016		REVERSE LATE FEE	-40.00		
08/27/2016		Guarantor Responsibility			
09/07/2016		Reversed Ref # 0003690612 from CALIFORNIA IRONWORK	685.44		
09/07/2016		Reversed Ref # 132432 from ALLIED COLLECTION	90.00		
09/07/2016		REVERSE ALLIED COMM ADJ	60.00		
05/14/2015	99140	Emergency anesthesia	240.00		
08/10/2015		External Collection	-240.00		
08/27/2016		Reverse External Collection	240.00		
08/27/2016		ADDITIONAL CONTRACTUAL WOFF	-104.00		
08/27/2016		REVERSE POSTED CHARGE	-240.00		
08/27/2016		REINSTATE ADJUSTMENT	104.00		

ACS000152

ANESTHESIOLOGY CONSULTANTS, INC.
PO BOX 50209
HENDERSON, NV 89016-0209

Business Phone (702) 878-0070
Office Hours 8:00 AM TO 4:30 PM

JAIME ZAVALA

Credit Card Using For Payment		
<input type="checkbox"/> Visa <input type="checkbox"/> Mastercard		
Card Number	CSC Num	Amount
Signature		Exp. Date
Statement Date	Balance Due	Account #
01/22/2018	0.00	
Minimum Payment	0.00	Show Amount Paid Here \$

Remit To

ANESTHESIOLOGY CONSULTANTS, INC.
PO BOX 50209
HENDERSON, NV 89016-0209

☐ Please check box if address is incorrect or insurance information has changed, and indicate the change(s) on reverse side

STATEMENT

Please detach and return top portion with your payment

Date	Ref #	Description	Charges and credits	Insurance pending	Guarantor balance
08/27/2016		Guarantor Responsibility			
05/14/2015	4250F	Wrmng 4 surg normothermia			
05/25/2015		Guarantor Responsibility			
05/14/2015	G9363	Mac or pnb w/o genanes <60m			
05/25/2015		Guarantor Responsibility			
05/14/2015	00840	Anes service separate from the hospital	1,200.00		
09/07/2016		Claim to ANTHEM BCBS CO BLUE CARD			
09/07/2016		Ref # 3690612 from ANTHEM BCBS CO BLUE CARD	-563.04		
09/07/2016		Contractual write off	-574.40		
09/07/2016		Copay 62.56			
09/07/2016		DIRECT PYMNT COMM ADJ	225.22		
09/07/2016		COMMISSION OFFSET ADJ	-225.22		
09/07/2016		Ref # 132432 from ALLIED COLLECTION	-76.40		
09/07/2016		LATE FEE	40.00		
09/07/2016		DIRECT PYMNT COMM ADJ	30.56		
09/07/2016		COMMISSION OFFSET ADJ	-30.56		
09/07/2016		External Collection	-26.16		
09/07/2016		Guarantor Responsibility			
05/14/2015	99140	Emergency anesthesia	240.00		
09/07/2016		Claim to ANTHEM BCBS CO BLUE CARD			
09/07/2016		Ref # 3690612 from ANTHEM BCBS CO BLUE CARD	-122.40		
09/07/2016		Contractual write off	-104.00		
09/07/2016		Copay 13.60			
09/07/2016		DIRECT PYMNT COMM ADJ	48.96		
09/07/2016		COMMISSION OFFSET ADJ	-48.96		
09/07/2016		Ref # 132432 from ALLIED COLLECTION	-13.60		
09/07/2016		DIRECT PYMNT COMM ADJ	5.44		
09/07/2016		COMMISSION OFFSET ADJ	-5.44		
09/07/2016		Guarantor Responsibility			
05/14/2015	4250F	Wrmng 4 surg normothermia			
08/27/2016		Guarantor Responsibility			
05/14/2015	G9363	Mac or pnb w/o genanes <60m			

ACS000153

ANESTHESIOLOGY CONSULTANTS, INC.
PO BOX 50209
HENDERSON, NV 89016-0209

Business Phone (702) 878-0070
Office Hours 8:00 AM TO 4:30 PM

JAIME ZAVALA
[REDACTED]

Credit Card Using For Payment		
<input type="checkbox"/> Visa <input type="checkbox"/> Mastercard		
Card Number	CSC Num	Amount
Signature		Exp. Date
Statement Date	Balance Due	Account #
01/22/2018	0.00	[REDACTED]
Minimum Payment	0.00	Show Amount Paid Here \$

Remit To

ANESTHESIOLOGY CONSULTANTS, INC.
PO BOX 50209
HENDERSON, NV 89016-0209

☐ Please check box if address is incorrect or insurance information has changed, and indicate the change(s) on reverse side

STATEMENT

Please detach and return top portion with your payment.

Date	Ref #	Description	Charges and credits	Insurance pending	Guarantor balance
08/27/2016		Guarantor Responsibility			
09/07/2016	ONACC	Guarantor pymt line items reversed to On Account.	-90.00		
09/07/2016	ONACC	Applied to line items from On Account.	90.00		
		Total for patient: ZAVALA, JAIME	0.00		
Total due					0.00

	Current	over 22 days	over 44 days	over 900 days	over 999 days	Total
Insurance Pending	0.00	0.00	0.00	0.00	0.00	0.00
Guarantor Responsibility	0.00	0.00	0.00	0.00	0.00	0.00

Account # AC282302
ANESTHESIOLOGY CONSULTANTS, INC.

Please Pay This Amount

>>>> 0.00

ACS000154

PaymentId - QP00839993

3690612 - Page: 1

CALIFORNIA IRONWORKERS FIELD WELFARE PLAN

131 North EL Molino Ave. Suite 330, Pasadena, CA 91101

CHECK #: 3 [REDACTED]**Date Issued:** 07/21/2016**Provider Name:** ANESTHESIOLOGY CONSULTANTS INC
PO BOX 50209
HENDERSON, NV 89016**Provider ID #:** [REDACTED]

Patient Name: JAIME RETIGUIN					Patient ID #: [REDACTED]						
Subscriber Name: JAIME RETIGUIN					Subscriber ID #: [REDACTED]						
Claim ID: [REDACTED]					Patient Acct #: [REDACTED]						
Line Num	Date of service	Service Code	Units	Billed Amt	Allowed Amt	Disallow Amt	Reason Code	Ded Amt	Co-Pay Amt	Co-Ins Amt	Amt Paid
1	05/14/15	00840	1	1,200.00	625.68	0.00	R99	0.00	0.00	625.68	563.04
2	05/14/15	01999	1	40.00	0.00	40.00	C005, R99	0.00	0.00	0.00	0.00
3	05/14/15	99140	1	240.00	136.00	0.00	R99	0.00	0.00	136.00	122.40
Claim Total				\$1,480.00	\$761.68	\$40.00		\$0.00	\$0.00	\$761.68	\$685.44

Reason Code Remarks:
 C005 - Not a covered service under the Plan
 R99 - Blue Cross savings applied.

Comments:

Total Patient Responsibility: \$761.68
Claim Adjustment Amount: \$0.00
Previous Claim Paid Amount: \$0.00
Amount Paid on Claim: \$685.44

Check Amount: \$685.44

For Questions Regarding This Claim, Please Call Customer Service (800) 527-4613.

ACS000155

3690612

CALIFORNIA IRONWORKERS FIELD WELFARE PLAN
131 NORTH EL MOLINO AVE., SUITE 330 PASADENA CA 91101

DOCUMENT IS PRINTED ON CHEMICALLY REACTIVE PAPER - THE BACK OF THIS DOCUMENT INCLUDES A TAMPER EVIDENT CHEMICAL WASH WARNING BOX

CALIFORNIA IRONWORKERS FIELD WELFARE PLAN
131 NORTH EL MOLINO AVE., SUITE 330 PASADENA CA 91101

Drawn on
Wells Fargo Central Bank
Calabasas, California

90-477
1222



CHECK NO.	DATE	AMOUNT
[REDACTED]	07/21/16	\$****685.44

PAY ***685 dollars and 44 cents

WELFARE
ACCOUNT

VOID 6 MONTHS
FROM DATE OF CHECK

[Signature]
[Signature]

CLM-F

TO
THE
ORDER
OF

ANESTHESIOLOGY CONSULTANTS INC
PO BOX 50209
HENDERSON NV 89016



ACS000156

Paymentid - QP00839993

3690612 - Page: 1

CALIFORNIA IRONWORKERS FIELD WELFARE PLAN

131 North EL Molino Ave. Suite 330, Pasadena, CA 91101

CHECK #: [REDACTED]

Date Issued: 07/21/2016

Provider Name: ANESTHESIOLOGY CONSULTANTS INC
 PO BOX 50209
 HENDERSON, NV 89016

Provider ID #: [REDACTED]

Patient Name: JAIME RETIGUIN				Patient ID #: [REDACTED]							
Subscriber Name: JAIME RETIGUIN				Subscriber ID #: [REDACTED]							
Claim ID: [REDACTED]				Patient Acct #: [REDACTED]							
Line Num	Date of service	Service Code	Units	Billed Amt	Allowed Amt	Disallow Amt	Reason Code	Ded Amt	Co-Pay Amt	Co-Ins Amt	Amt Paid
1	05/14/15	00840	1	1,200.00	625.60	0.00	R99	0.00	0.00	62.56	563.04
2	05/14/15	01999	1	40.00	0.00	40.00	C005, R99	0.00	0.00	0.00	0.00
3	05/14/15	99140	1	240.00	136.00	0.00	R99	0.00	0.00	13.60	122.40
Claim Total				\$1,480.00	\$761.60	\$40.00		\$0.00	\$0.00	\$76.16	\$685.44

Reason Code Remarks:

C005 - Not a covered service under the Plan
 R99 - Blue Cross savings applied.

Total Patient Responsibility: \$76.16
Claim Adjustment Amount: \$0.00
Previous Claim Paid Amount: \$0.00
Amount Paid on Claim: \$685.44

Comments:

Check Amount: \$685.44

For Questions Regarding This Claim, Please Call Customer Service (800) 527-4613.

ACS000157

HERNANDEZ, CARMEN G

IMMI

Date run: 01/22/2018 02:39

Account Detail Listing

Practice corp: ANESTHESIOLOGY CONSULTANTS, INC.

Guarantor: [REDACTED] ALA

Account # [REDACTED]

Date	TranCode	Qty	Description	Patient	Amount	Balance
05/14/2015	SVCFE	1	00840 AA ANESTH SURG LOWER ABDOMEN	ZAVALA, JAIME	1200.00	
09/07/2016	REBILL		Claim # [REDACTED] to BCBS / ANTHEM BCBS		0.00	
09/07/2016	IPYMT		Check # [REDACTED] from ANTHEM BCBS CO		-563.04	
	CWOFF		Contractual write off		-574.40	
	COPAY		Copay 62.56		0.00	
09/07/2016	GPYMT		From On Account Check # [REDACTED] from		-76.40	
09/07/2016	MADJP		DPACA DIRECT PYMNT COMM ADJ		225.22	
09/07/2016	MADJN		ACA COMMISSION OFFSET ADJ		-225.22	
09/07/2016	MADJP		LFEE LATE FEE		40.00	
09/07/2016	MADJP		DPACA DIRECT PYMNT COMM ADJ		30.56	
09/07/2016	MADJN		ACA COMMISSION OFFSET ADJ		-30.56	
09/07/2016	EXCOL		External collection - ALLIED COLLECTION AGENCY		-26.16	
			Balance -09/07/2016- Guarantor			0.00
05/14/2015	SVCFE	1	99140 Emergency anesthesia	ZAVALA, JAIME	240.00	
09/07/2016	REBILL		Claim # 918240(P 927475) to BCBS / ANTHEM BCBS		0.00	
09/07/2016	IPYMT		Check # 3690612 (150902) from ANTHEM BCBS CO		-122.40	
	CWOFF		Contractual write off		-104.00	
	COPAY		Copay 13.60		0.00	
09/07/2016	GPYMT		From On Account Check # [REDACTED] (144478) from		-13.60	
09/07/2016	MADJP		DPACA DIRECT PYMNT COMM ADJ		48.96	
09/07/2016	MADJN		ACA COMMISSION OFFSET ADJ		-48.96	
09/07/2016	MADJP		DPACA DIRECT PYMNT COMM ADJ		5.44	
09/07/2016	MADJN		ACA COMMISSION OFFSET ADJ		-5.44	
			Balance -09/07/2016- Guarantor			0.00
05/14/2015	SVCFE	1	4250F 8P Wrmng 4 surg normothermia	ZAVALA, JAIME	0.00	
			Balance -08/27/2016- Guarantor			0.00
05/14/2015	SVCFE	1	G9363 Mac or pnb w/o genanes <60m	ZAVALA, JAIME	0.00	
			Balance -08/27/2016- Guarantor			0.00
05/14/2015	SVCFE	1	00840 AA ANESTH SURG LOWER ABDOMEN	ZAVALA, JAIME	1200.00	
05/26/2015	CLAIM		Cancelled Claim [REDACTED] CLAIM) to PNDMCD /		0.00	
08/06/2015	MADJP		LFEE LATE FEE		40.00	
08/10/2015	EXCOL		External collection - ALLIED COLLECTION AGENCY		-1240.00	
08/04/2016	GPYMT		Check # 132432 (144476) from ALLIED		-90.00	
08/04/2016	RVCOL		RVCOL Reverse External Collection		1240.00	
08/04/2016	MADJN		ACA COMMISSION OFFSET ADJ		-60.00	
08/04/2016	EXCOL		External collection - ALLIED COLLECTION AGENCY		-1090.00	
08/08/2016	RVCOL		RVCOL Reverse External Collection		1090.00	
08/08/2016	MADJN		ACA COMMISSION OFFSET ADJ		-171.36	
08/08/2016	MADJP		DPACA DIRECT PYMNT COMM ADJ		171.36	
08/09/2016	GPYMT		Check # 0003690612 (148873) from CALIFORNIA		-685.44	
08/09/2016	MADJP		RACA REVERSE ALLIED COMM ADJ		171.36	
08/09/2016	MADJN		ROPAC REVERSE DIRECT PYMNT COMM		-171.36	
08/09/2016	MADJN		ACA COMMISSION OFFSET ADJ		-274.18	
08/09/2016	MADJP		DPACA DIRECT PYMNT COMM ADJ		274.18	
08/15/2016	EXCOL		External collection - ALLIED COLLECTION AGENCY		-404.56	
08/27/2016	RVCOL		RVCOL Reverse External Collection		404.56	
08/27/2016	MADJN		WOFF ADDITIONAL CONTRACTUAL WOFF		-574.40	
08/27/2016	RVFEE		REVCH REVERSE POSTED CHARGE		-1200.00	
08/27/2016	MADJP		REI REINSTATE ADJUSTMENT		574.40	
08/27/2016	MADJN		RLFEE REVERSE LATE FEE		-40.00	
09/07/2016	RVPMT		Reversed (MPTL) Check [REDACTED] 148873)		685.44	

HERNANDEZ, CARMEN G

IMMI

Date run: 01/22/2018 02:39

Account Detail Listing

Practice corp: ANESTHESIOLOGY CONSULTANTS, INC.

Guarantor: JAIME ZAVALA

Account # 14022002

Date	TranCode	Qty	Description	Patient	Amount	Balance
09/07/2016	RVPMT		Reversed Check # 132432 (144476) from ALLIED		90.00	
09/07/2016	MADJP		RACA REVERSE ALLIED COMM ADJ		60.00	
			Balance -08/27/2016- Guarantor			0.00
05/14/2015	SVCFE~	1	99140 Emergency anesthesia	ZAVALA, JAIME	240.00	
05/26/2015	CLAIM		Cancelled Claim # 699270(NO CLAIM) to PNDMCD /		0.00	
08/10/2015	EXCOL		External collection - ALLIED COLLECTION AGENCY		-240.00	
08/27/2016	RVCOL		RVCOL Reverse External Collection		240.00	
08/27/2016	MADJN		WOFF ADDITIONAL CONTRACTUAL WOFF		-104.00	
08/27/2016	RVFEE		REVCH REVERSE POSTED CHARGE		-240.00	
08/27/2016	MADJP		REI REINSTATE ADJUSTMENT		104.00	
			Balance -08/27/2016- Guarantor			0.00
05/14/2015	SVCFE~	1	4250F 8P Wmng 4 surg normothermia	ZAVALA, JAIME	0.00	
			Balance -05/25/2015- Guarantor			0.00
05/14/2015	SVCFE~	1	G9363 Mac or pnb w/o genanes <60m	ZAVALA, JAIME	0.00	
			Balance -05/25/2015- Guarantor			0.00
01/22/2018	ONACCT		On account transactions		0.00	
			Balance			0.00
09/07/2016	GPYMT		Guarantor payment line items reversed.		-90.00	
09/07/2016	RVPMT		Applied to line items.		90.00	